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*Plaintiff Zoya Kovalenko*

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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

ZOYA KOVALENKO,  
  
Plaintiff,  
  
v.

KIRKLAND & ELLIS LLP, MICHAEL DE  
VRIES, MICHAEL W. DE VRIES, P.C.,  
ADAM ALPER, ADAM R. ALPER, P.C.,  
AKSHAY DEORAS, AKSHAY S. DEORAS,  
P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-cv-05990-HSG-TSH

**JOINT ADMINISTRATIVE MOTION  
OBJECTING TO PROVISION OF  
PUBLIC ACCESS**

Pursuant to Civil Local Rules 77-3(c) and 7-11, Plaintiff Zoya Kovalenko and Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey hereby file the instant joint administrative motion objecting to provision of public access for the case management conference scheduled for April 8, 2025, at 2:00 p.m. (the “CMC”).

Local Rule 77-3(b) provides as follows: “Remote public access will not be permitted where doing so would risk interfering with the integrity of the proceedings. This includes, but is not limited to, situations where remote public access would risk infringing on privacy interests, creating safety concerns, or materially affecting witness testimony.” Here, remote public access for the CMC would risk interfering with the integrity of the proceedings, and specifically, the privacy rights of the parties, because the parties anticipate that at the CMC, the Court and the parties will discuss private confidential discussions following the parties’ mediation in November. *See HotSpot Therapeutics, Inc. v. Nurix Therapeutics, Inc.*, No. 22-CV-04109-TSH, 2023 WL 3259471, at \*3 (N.D. Cal. May 3, 2023); *In re Lidoderm Antitrust Litig.*, No. 14-MD-02521-WHO, 2016 WL 4191612, at \*26 (N.D. Cal. Aug. 9, 2016).

In light of the foregoing, the parties respectfully request that the Court grant the Joint Administrative Motion.

Dated: March 25, 2025

JOSEPH C. LIBURT  
Orrick, Herrington & Sutcliffe LLP

By: /s/ Joseph C. Liburt  
Joseph C. Liburt  
Attorneys for Defendants

Dated: March 25, 2025

ZOYA KOVALENKO

By: /s/ Zoya Kovalenko  
Zoya Kovalenko  
Plaintiff

**Attestation Re Electronic Signatures**

I, Joseph C. Liburt, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 25, 2025

\_\_\_\_\_/s/ Joseph C. Liburt

Joseph C. Liburt